

**WASTE MANAGEMENT**

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June 22, 2006

Kim Muratore, Case Developer (SFD-7-D)
US EPA, Region 9
75 Hawthorne St.
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Michael Massey
Fax: 415.947.3570

Re: Response Supplement to 104(e) Information Request
San Fernando Valley/North Hollywood Superfund Site
Bradley Landfill and Recycling Center
Waste Management Recycling and Disposal Services of California

Dear Sirs:

This letter is a supplemental response addressing specific questions within your 104(e) request for the above referenced facility dated April 25, 2006. Per prior arrangement with Michael Massey of EPA Region 9 Office of Regional Counsel, Waste Management Recycling and Disposal Services of California, Inc. (Respondent) previously responded to the other questions.

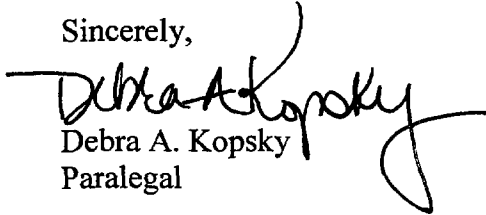
Mr. Massey and Respondent representatives discussed, during a telephone conference call this past Wednesday, provisions for providing explanations of both burdens associated with, and means of narrowing the scope and production of documents relating to, the requested information. Respondent noted that while the company is willing to provide the information requested to the extent possible; the extremely broad nature and scope of the questions, will necessitate an unduly burdensome commitment of time and financial resources to obtain all requested information.

Consequently, Mr. Massey proposed that Respondent develop a matrix summarizing the nature and availability of requested data. The matrix is attached. It is our understanding that EPA will use this information to determine whether additional information need be submitted. In addition to submission of the attached matrix, Respondent has attached written responses to the unanswered questions. Backup documentation will be delivered under separate cover.

Kim Muratore
June 22, 2006
Page 2

Should you have immediate questions or concerns with this submission, please contact Debra Kopsky at 630-572-2486.

Sincerely,



Debra A. Kopsky
Paralegal

Attachments

Cc: Phil Perley (w/attachments)
Steve Richtel (w/attachments)
David Winfrey, Esq. (w/attachments)

Bradley Landfill and Recycling Center
Response to General Notice Letter
Summary of Available Data
June 22, 2006

Question Number	Subject	Comment	Available	Archived	Difficult to Retrieve	Record Not Available
12.	Real Estate				Based on current research, documents may not be available.	
13.	Ownership				Information not available at this time, may be available upon further research.	
14.	Ownership				Information not available at this time, may be available upon further research.	
15.	Ownership				Information not available at this time, may be available upon further research.	
16.	Ownership				Information not available at this time, may be available upon further research.	
19.d	Stormwater Drainage	Storm Water Pollution and Prevention Plan	2003-2005	Stormwater reports – 1995/1996, 1990/2000, 2001/2002, 2002/2003		Reports not listed in permanent storage are not available. Storm water drainage system except in

Bradley Landfill and Recycling Center
Response to General Notice Letter
Summary of Available Data
June 22, 2006

						select reports.
19.a-c; f	Facility Map		2006			MW 4926C, 4914G and 4916C boring logs destroyed; 4916G and 4916H well construction logs destroyed
19.e	Building additions, demolitions, changes					Records are incomplete except when building or other permits required
21	Chemical Inventory		2005, 2001			
21	MSDS		2005	1986-2001		Prior to 1986 (MSDS); otherwise not known
22.a	Brand Name	As noted on MSDS	2005	1986-2001		Prior to 1986 (MSDS); otherwise not known
22.a	Chemical Composition	As Noted on MSDS	2005	1986-2001		Prior to 1986 (MSDS); otherwise not known
22.a	Quantity Used					No records available on quantity
22.b	Locations Stored and Used		2005 and 2001		2000-2004	Prior to 2004
22.b	Locations Disposed of (Hazardous Waste)	Hazardous Waste Disposal Manifests	2002-2006			
22.c	Non-Hazardous Waste Type					Not Known
22.c	Hazardous Waste	Disposal Manifests	2002-2006		2000-2000	Prior to 2000 records missing or were destroyed.
22.c	Current Practices		2005-2006			
22.d	Quantities, Period,					This data is not available

Bradley Landfill and Recycling Center
Response to General Notice Letter
Summary of Available Data
June 22, 2006

	Identity					
22.e	Suppliers, shipping manifests, financial data				2000-2006	Prior to 2000
23	Air Quality Data	Flare Source Tests	2003-2005			Data availability prior to 2003 unknown
23	Air Quality Data	Internal Combustion Engine Source Tests	2003-2006			Data availability prior to 2003 unknown
23	Air Quality Data	Rule 1150.1 Quarterly Reports	2Q 2004 – 1Q 2006	1996, 1997, 1998, 1999, 2000, 2001, 2003		
23	Air Quality Data	Rule 1150.1 Field Data			2Q 2004 – 1Q2006	Data availability prior to 2004 unknown
23	Air Quality Data	Other air data		1988, 1984, 1986, 1992-1995		
23	Groundwater Data	Annual or Semi Annual Monitoring Reports	2001-2005	1985, 1989, 1990, 1991, 1993, 1995, 1996, 1997, 2000		
23	Analytical data packages				Electronic database	
28	Waste Streams		2005-2006		2000-2004	Prior to 2000
30	Sumps		2005-2006		2000-2004	
31	Waste Storage		2005-2006			
32	Spills and releases		2005-2006	2000-2004		Prior to 2000

Notes: 14.a. MSDS records are mixed with other Waste Management facilities
22 MSDS records are mixed with other Waste Management facilities
22 Financial records retention policy is six years. Limited data maybe available for chemical usage at the gas plant.
28 Many records were destroyed in a facility fire in September 2000.
31 Many records were destroyed in a facility fire in September 2000
32 Many records were destroyed in a facility fire in September 2000

San Fernando Valley/North Hollywood Superfund Site
Supplemental Response to 104(e) Request for Information
Waste Management Recycling and Disposal Services of California, Inc.

- 9. Identify and explain any and all sales of the Company's assets if the sale represented a sale of substantially all of the Company's assets.**

Not applicable as no such transaction has occurred.

- 10. Identify and explain any investments by the Company in other businesses, companies, or corporations equating to 5% or more of that other business, company, or corporation from the formation of the Company to the present.**

Not applicable as no such investments have occurred.

- 19. Provide a scaled map of the Facility that includes the locations of significant buildings and features. Indicate the locations of any maintenance shops, machine shops, degreasers, liquid waste tanks, chemical storage tanks, and fuel tanks. Provide a physical description of the Facility and identify the following:**

As an active landfill site, surface and subsurface infrastructure associated with the gas collection and control system, condensate management, and leachate collection are frequently modified to accommodate landfill operations. Piping is typically modified on a daily basis as fill operations progress. Therefore, exact dates are not available. A map displaying this information follows the response. Please note that on the index legend, "LFG" refers to Landfill Gas.

- a. Surface structures (e.g., buildings, tanks, containment and/or storage areas, etc.)**

See attached figure.

- b. Subsurface structures (e.g., underground tanks, sumps, pits, clarifiers, etc.);**

See attached figure. A sump is maintained at the maintenance area to collect wastewater during equipment washing.

- c. Groundwater and dry wells, including drilling logs, date(s) of construction or completion, details of construction, uses of the well(s), dates(s) the well(s) was/were abandoned, depth to groundwater, depth of well(s) and depth to and of screened interval(s);**

See attached figure for well locations and response to Question 23 (Annual Groundwater Monitoring reports). Boring logs are included on the attached disc. It should be noted that the following logs were destroyed in the September 2000 fire at the facility:

Monitoring well 4926C, 4914G, and 4916C and well construction logs for 4916G and 4916H (boring logs are attached).

- d. Past and present stormwater drainage system and sanitary sewer system, including septic tank(s) and subsurface disposal field(s);**

See attached figure. An approved Storm Water Pollution Prevention Plan will be provided upon request. Stormwater reports will be provided upon request.

The facility does not have any sewer lines, septic tanks or subsurface disposal fields.

- e. Any and all additions, demolitions or changes of any kind to physical structures on, under or about the Facility or to the property itself (e.g., excavation work), and state the date(s) on which such changes occurred; and**

In 2001 WM constructed and Internal Combustion engine plant to utilize a portion of the landfill gas generated at the site. The engine plant consists of 5 trailers, each containing an IC engine and controls. Adjacent to each engine trailer, there is a preconditioning landfill gas treatment skid consisting of blowers, compressors, and gas dryers/filters.

**San Fernando Valley/North Hollywood Superfund Site
Supplemental Response to 104(e) Request for Information
Waste Management Recycling and Disposal Services of California, Inc.**

In 2004 WM constructed a sound-insulating containment around the IC engine plant.

The flares were constructed in the late 1980s to early 1990s. Repairs and modifications have occurred since that time and are on-going.

The Hazardous Materials Storage Facility was constructed in 2004.

The above-ground leachate storage tanks were relocated in June 2006 from the top of the active landfill to the inactive Bradley East Landfill.

- f. The location of all waste storage or waste accumulation areas as well as waste disposal areas, including but not limited to dumps, leach fields, and burn pits.**

The entire facility is a waste storage and disposal area. There are no unpermitted "dumps" at this facility. There are no leach fields or burn pits.

- 21. Provide a list of all chemicals and hazardous substances used at the Facility, identifying the chemical composition and quantities used. Provide copies of Material Safety Data Sheets for all hazardous substances used.**

The 2001 and 2005 Chemical Inventory Data for the facility is enclosed. Copies of the MSDS for these substances are included on the attached disc. In addition, all archived MSDS are listed on the Records Management Forms immediately following this response. The archived MSDS information is voluminous and difficult to copy. Bradley Landfill and Recycling Company will retrieve and provide additional MSDS from archives as requested by the Agency.

- 22. Identify and provide the information below for all volatile organic compounds (most notably PCE; TCE; 1,1-DCE; MTBE; 14-DCA, cis-1,2-DCE; and carbon tetrachloride); Title 22 metals including total and hexavalent chromium; 1,4-dioxane; N-nitrosodimethylamine (NDMA); perchlorate; which are or were used at, or transported to, the Facility:**

- a. The trade or brand name, chemical composition, and quantity used for each chemical or hazardous substance and the Material Safety Data Sheet for each product;**

The 2001 and 2005 Chemical Inventory Data, is included on the disc provided to Question 21. The chemicals listed above are not used at the facility. Furthermore, there are no records available that indicate that the Bradley Landfill and Recycling Company used these chemicals within the last five years. It should be noted that in September 2000 most records were destroyed in a fire at the facility.

- b. The location(s) where each chemical or hazardous substance is or was used, stored and disposed of;**

Substances used to control landfill odors are stored near the Recycling Office and consumed along the facility fence line, at the gas collection and flare system, and at the wood waste and green waste processing center. Substances to maintain heavy and light equipment is stored and consumed at the light and heavy equipment maintenance facilities and accumulated within the Hazardous Waste Accumulation Area. All materials are stored within their manufacturer-supplied container prior to, and during use. For example, empty aerosol containers were considered Universal Waste and disposed of according to the Universal Waste regulations. Oily waste containers and steel containers over 55 gallons were sent to a licensed TSDF in concurrence with the Facility's Empty Container Management Program. Smaller containers were disposed of following the Facility's Empty Container Management Program.

Past practices are not fully known because of employee retirements and turnover. The Bradley Landfill and Recycling Company most likely used solvents during past maintenance activities in the past; chemical make up of the solvents has not been identified. In addition, there was not reason for the Bradley Landfill and Recycling Company to purchase or consume Title 22 metals including total and hexavalent chromium; 1,4-dioxane; N-nitrosodimethylamine (NDMA) or perchlorate during its operations (except for oily waste from spent hydraulic oil, and engine and transmission fluids).

San Fernando Valley/North Hollywood Superfund Site
Supplemental Response to 104(e) Request for Information
Waste Management Recycling and Disposal Services of California, Inc.

All heavy equipment is refueled from an off-site contracted refueling vehicle.

Gas Plant wastes oily waste containers and steel containers over 55 gallons were sent to a licensed TSDF in concurrence with the Facility's Empty Container Management Program. Smaller containers were disposed of following the Facility's Empty Container Management Program.

- c. The kinds of wastes (e.g., scrap metal, construction debris, motor oil, solvents, waste water), the quantities of wastes, and the methods of disposal for each chemical, waste, or hazardous substance;**

There are no records as to the quantity of hazardous materials stored or disposed of at the facility.

All hazardous substances are manifested and disposed of at a licensed TSDF or recycled by a licensed recycler.

Scrap metal generated from greenwaste and woodwaste operations during waste segregation are sent to a licensed recycler. Acceptable construction debris entering the facility is reused on site for beneficial use.

Wastewater is generated by the facility during equipment maintenance activities at the maintenance and gas plant areas. Wastewater, depending on volume, is transported via vacuum truck by a licensed transporter or via steel containers to a licensed recycler.

Hazardous waste manifests are provided on the attached to document disposal of hazardous substances.

- d. The quantity purchased (in gallons), the time period during which it was used, and the identity of all persons who used it; and**

The Bradley Landfill and Recycling Company does not purchase any of the VOCs listed above. Records indicate that in 2001 dimethyl ketone and 2-propanone was inventoried, stored and used; however, this chemical was stored and consumed at another Waste Management Inc.-owned facility.

- e. The supplier(s), and provide copies of all contracts, service orders, shipping manifests, invoices, receipts, canceled checks, or any other documents pertaining to the supply of chemical or hazardous substances.**

Supplier names are provided in the response to Question 21.

- 23. Provide copies of all environmental data or technical or analytical information regarding soil, water, and air conditions at or adjacent to the Facility, including, but not limited to, environmental data or technical or analytical information related to soil contamination, soil sampling, soil gas sampling, geology, water (ground and surface), hydrogeology, groundwater sampling, and air quality.**

Copies of environmental data related to water and air are enclosed. No environmental data has been collected regarding soil conditions at the Facility. The following reports are included with the discs included with this response:

Air and Landfill Gas:

Flare Source Tests 2003 through 2005

South Coast Air Quality Management District Rule 1150.1 Quarterly Reports for the period 2Q2004 through 1Q2006.

Source Test for the Internal Combustion Engines 2003 through 2006

Groundwater, Leachate,

Annual Groundwater Monitoring Reports from 2001 through 2005

Groundwater Well Boring Logs are provided in the response to Question 19.

Storm Water Reports for the period 1995 through 2005

The Storm Water Prevention Plan will be provided under separate cover.

San Fernando Valley/North Hollywood Superfund Site
Supplemental Response to 104(e) Request for Information
Waste Management Recycling and Disposal Services of California, Inc.

28. For each waste stream generated at the Facility, describe the procedures for (a) collection, (b) storage, (c) treatment, (d) transport, and (e) disposal of the waste stream.

1. Used Oil

Used oil from equipment maintenance is collected in a temporary drainage vessel during oil changes on equipment.

Used oil is then transferred and stored in a waste oil tank.

Used oil is not treated at the facility.

A licensed transporter removes the used oil in the waste oil tank through a vacuum or siphoning process.

The licensed transporter brings the used oil to a licensed processing facility where it is recycled for re-use.

2. Waste antifreeze

Waste antifreeze from equipment maintenance is collected in a temporary drainage vessel when radiators on equipment are drained.

Waste antifreeze is then transferred and stored in steel containers.

Waste antifreeze is not treated at the facility.

A licensed transporter removes the used oil in the waste oil tank through a vacuum or siphoning process.

The licensed hazardous waste contractor transports the waste antifreeze to a licensed processing facility.

3. Used Filters

Used oil filters from equipment maintenance are collected during filter changes on equipment.

Used filters are drained for excess oil but not treated at the facility.

Used filters are stored in covered steel containers.

A licensed special waste provider transports the full steel containers to a licensed processing facility where the used filters are recycled for re-use.

4. Lead Acid Batteries

Lead acid batteries from equipment maintenance are collected during battery changes on equipment.

Lead acid batteries are not treated at the facility.

Lead acid batteries are stored in covered approved containers.

A licensed special waste provider transports the lead acid batteries to a licensed facility where they are recycled for re-use.

5. Clay absorbent mixture with oil

Clay absorbent mixture with oil is collected during clean-up activities of minor spills occurring in the maintenance areas.

This mixture is not treated at the facility.

This mixture is stored in covered steel containers.

A licensed special waste provider transports the containers containing the mixture to a licensed processing facility where it is incinerated.

6. Landfill Gas

Landfill gas at Bradley landfill is generated by the decomposition of buried waste.

The gas is recovered from the landfill by a system of vertical and horizontal gas recovery wells. Large blowers pull the gas to three enclosed landfill gas flares.

Gas is not stored.

The recovered gas is treated by flaring, combustion or compression in accordance with South Coast Air Quality Management District Operating Permits. A portion of the recovered landfill gas is utilized by two landfill gas-to-energy power plants.

Compressed gas is transported from the site for co-generation purposes.

Gas disposal is done via treatment described above.

7. Landfill Gas Condensate

Landfill gas condensate is generated by the cooling of landfill gas as it is extracted from the landfill. It is also generated at the condensate knockout pots located at the flare station.

Condensate drains by gravity and is collected in a series of condensate sumps positioned around the perimeter of the landfill. It is also collected within each flare's condensate knockout pot as gas is routed to each flare.

Condensate is also collected at the compressor plant in a series of vessels and an oil-water separator chamber.

**San Fernando Valley/North Hollywood Superfund Site
Supplemental Response to 104(e) Request for Information**

Waste Management Recycling and Disposal Services of California, Inc.

Collected landfill gas condensate is treated in two ways. Condensate from the compressor operation is routed through an oil-water separator and then pH adjusted prior to discharge to the sanitary sewer system. Condensate from the flare knockout pots is filtered prior to injection into the flares where it is vaporized. The caustic soda, used in pH adjustment, is stored in 55-gallon drums that are returned to the vendor when empty.

The site does not transport condensate off site.

Disposal is described above. Condensate is either disposed via sanitary sewer system or via injection and vaporization within the landfill gas flares.

8. Oil from Compressor Operations

Waste oil generated by the compressor operations is stored in steel containers prior to removal and disposal by a licensed transporter or special waste contractor.

9. Landfill Leachate

Landfill leachate is generated by the infiltration of stormwater through buried waste and by liquids present within buried waste.

Leachate is collected by a series of down-hole piston pumps that remove leachate from the landfill liner system and from within the waste mass. Pumps remove the collected leachate and route it to storage tanks prior to discharge to the sanitary sewer system.

Collected leachate is stored in two 21,000-gallon storage tanks (with secondary containment) prior to discharge to the sewer system.

No treatment is required for the leachate. However, an anti-foaming agent is applied prior to discharge into the sanitary sewer manhole. Leachate is ultimately treated at the municipal wastewater treatment plant.

Leachate is not transported off site. On site, leachate may be transported via vacuum truck to the storage tanks. Leachate is disposed through the city sanitary sewer system and routed to the municipal wastewater treatment plant.

10. Hazardous waste generated through Load Check Program

Bradley Landfill is required by regulations to implement a robust load check program for incoming waste.

Occasionally, hazardous materials such as paints, waste propane tanks and electronic waste, are found during the load checks. Materials not permitted for disposal at the landfill that are found during the load checks are segregated and accumulated in the hazardous material storage facility. A licensed special waste provider routinely collects these materials for proper transport and disposal to a licensed TSDF. Hazardous waste manifests are included with this submittal.

11. Wastewater

Wastewater is collected from equipment maintenance activities at the gas plant or the equipment wash sump at the maintenance area. For example, wastewater as rinsate is derived from hydroblasting vessels and tanks at the gas plant. No treatment is required. The wastewater is not transported off site. Depending on volume or nature of equipment maintenance activity, this wastewater may be collected by a vacuum truck or steel container by a licensed transporter or special waste provider to be recycled at a licensed recycler.

30. Please describe the methods used by the Company to remove waste streams from sumps at the Facility.

Refer to response to Question 29.

31. Please identify all wastes that were stored at the Facility prior to shipment for disposal. Describe the storage procedures for each waste that was stored prior to disposal.

Leachate is stored in two 21,000 gallon storage tanks positioned within a lined secondary containment.

Condensate is stored in a variety of containment vessels at the main gas plant.

Used oil is stored in a waste oil tank prior to collection by a licensed special waste provider.

Lead acid batteries are stored in covered approved containers.

Clay absorbent mixture with oil is stored in covered steel containers.

San Fernando Valley/North Hollywood Superfund Site
Supplemental Response to 104(e) Request for Information
Waste Management Recycling and Disposal Services of California, Inc.
Waste antifreeze is stored in covered steel containers.

Hazardous materials removed from loads during load check programs are accumulated in hazardous material storage facility.

Wastewater from equipment maintenance at the gas plant is simultaneously vacuumed out by a vacuum truck during the equipment maintenance activity or, depending on volume, stored in steel containers before being transported to a licensed recycler. Wastewater generated at the equipment wash pad within the maintenance area is collected in a sump and then vacuumed out regularly by a vacuum truck before being transported to a licensed recycler.

Caustic soda, used in pH adjustment of condensate, is stored in 55-gallon drums. The drums are returned to the vendor when empty.

- 32. Please identify all leaks, spills, or other releases into the environment of any hazardous substances or pollutants or contaminants that have occurred at or from the Facility. In addition, identify and provide supporting documentation of:**
- a. The date each release occurred;**
 - b. The cause of each release;**
 - c. The amount of each hazardous substance, waste, or pollutant or contaminant released during each release;**
 - d. Where each release occurred and what areas were impacted by the releases; and**
 - e. Any and all activities undertaken in response to each release, including the notification of any local, state or federal government agencies about the release.**

There have been no leaks, spills or other release of reportable quantity into the environment of any hazardous substances or pollutants or contaminants that have occurred at or from the Facility in the past 5 years.

Two reportable spills occurred after September 2000. On October 25, 2000 a 70 gallon diesel spill occurred within the facility (California Office of Emergency Services Control Number 00-5068). Additional information is summarized on the attached Emergency Release Follow-Up Reporting Form.

A second spill was reported on December 6, 2000. The California Office of Emergency Services Control Number is 00-5701. Additional information is included on the Report of Special Occurrences.

On November 19, 2001 the Los Angeles City Stormwater Management Division was notified of a treated landfill gas condensate spill. Additional information is included on the Report of Special Occurrences.

On March 12, 2004 foam was observed discharging from a city sewer manhole lid. The Industrial Waste Management Division and the Regional Water Quality Control Board was notified of the release. Additional information is included on the Report of Special Occurrences.

On October 2, 2004 a condensate leak was detected on one of the Flare 1 injector nozzles. Additional information is included on the Report of Special Occurrences.

On October 21, 2002 a Notice of Violation was issued for Odor Nuisances. Additional information is included on the Incident Alert Fax.

San Fernando Valley/North Hollywood Superfund Site
Supplemental Response to 104(e) Request for Information

Waste Management Recycling and Disposal Services of California, Inc.

33. Provide copies of any correspondence between the Company and local, state, or federal authorities concerning the use, handling, or disposal of hazardous substances at the Facility, including but not limited to any correspondence concerning any of the releases identified in response to the previous question.

Please see the response to Question 32.